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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BIG ROCK ASSETS MANAGEMENT LLC, a  
Nevada limited liability company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING  
CORPORATION, BANK OF AMERICA, N.A.,  
a national association; DOES I through X,  
inclusive,

Defendants.

Case No.: 2:22-cv-00909-CDS-DJA

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

**(FOURTH REQUEST)**

Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have an additional thirty (30) days, up to and including **October 12, 2022**, to file its response to Big Rock's complaint, which is currently due on September, 2022.

Good cause exists to grant the requested extension since the parties are engaged in settlement negotiations with respect to this case and another pending in the court. *See Big Rock Asserts Mgmt., LLC v. MTC Financial Inc.*, No. 2:22-cv-1212-APG-NJK. Big Rock also recently filed another case against BANA in state court. *See Big Rock Assets Mgmt., LLC v. NDSC*, No. A-22-858117-C. The parties are attempting to reach a global settlement. Incurring fees related to a response could impact a potential settlement.

This is the parties' fourth request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

DATED this 12<sup>th</sup> day of September, 2022.

<b>AKERMAN LLP</b>	<b>ANDREW BAO &amp; ASSOCIATES</b>
<u>/s/ Scott R. Lachman</u>	<u>/s/ Andrew A. Bao</u>
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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Case No.: 2:22-cv-00909-CDS-DJA

DATED: September 13, 2022

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